

**UNITED STATES BANKRUPTCY COURT  
Middle DISTRICT OF Pennsylvania  
Wilkes-Barre DIVISION**

In re:	) CASE NO. 5:19-bk-01904-RNO
	) JUDGE Robert N. Opel II
	)
Peter Nicholas DeConzo,	)
Donna C Deconzo	)
aka Dominica DeConzo,	)
	)
Debtors.	)
	)
	)

**WELLS FARGO BANK, NATIONAL ASSOCIATION, AS TRUSTEE FOR  
LEHMAN MORTGAGE TRUST MORTGAGE PASS-THROUGH CERTIFICATES,  
SERIES 2006-9'S NOTICE OF DEBTOR'S REQUEST FOR FORBEARANCE DUE TO  
THE COVID-19 PANDEMIC**

Now comes Creditor WELLS FARGO BANK, NATIONAL ASSOCIATION, AS TRUSTEE FOR LEHMAN MORTGAGE TRUST MORTGAGE PASS-THROUGH CERTIFICATES, SERIES 2006-9 ("Creditor"), by and through undersigned counsel, and hereby submits Notice to the Court of the Debtor's request for mortgage payment forbearance based upon a material financial hardship caused by the COVID-19 pandemic.

The Debtor recently contacted Creditor requesting a forbearance period of 6 months and has elected to not tender mortgage payments to Creditor that would come due on the mortgage starting 04/01/2020 through 09/01/2020. Creditor holds a secured interest in real property commonly known as 85 WINONA RD., MOUNT POCONO, Pennsylvania 18344; as evidenced by claim number 12-1 on the Court's claim register. Creditor, at this time, does not waive any rights to collect the payments that come due during the forbearance period. If the Debtor desires to modify the length of the forbearance period or make arrangements to care for the forbearance

period arrears, Creditor asks that the Debtor or Counsel for the Debtor make those requests through undersigned counsel.

Per the request, Debtor will resume Mortgage payments beginning 10/01/2020 and will be required to cure the delinquency created by the forbearance period (hereinafter “forbearance arrears”). Creditor has retained undersigned counsel to seek an agreement with Debtor regarding the cure of the forbearance arrears and submit that agreement to the Court for approval. If Debtor fails to make arrangements to fully cure the forbearance arrears, Creditor reserves its rights to seek relief from the automatic stay upon expiration of the forbearance period.

**Robertson, Anschutz, Schneid & Crane LLC**

Authorized Agent for Secured Creditor  
10700 Abbott's Bridge Road, Suite 170  
Duluth, GA 30097  
Telephone: (470) 321-7112

By: /s/ Charles G. Wohlrab  
Charles G. Wohlrab, Esquire  
Email: [cwohlab@rascrane.com](mailto:cwohlab@rascrane.com)

**CERTIFICATE OF SERVICE**

I certify that I caused a true and accurate copy of the foregoing *Notice of Debtor's Request for Forbearance* to be served upon the following parties in the following fashion on this 22nd day of May 2020:

**Peter Nicholas DeConzo**  
**85 Winona Rd**  
**Mount Pocono, PA 18344**

**Donna C Deconzo**  
**85 Winona Rd**  
**Mount Pocono, PA 18344**

And via electronic mail to:

**Ronald V. Santora**  
**Bresset and Santora**  
**1188 Wyoming Avenue**  
**Forty Fort, PA 18704**

**Charles J DeHart, III (Trustee)**  
**8125 Adams Drive, Suite A**  
**Hummelstown, PA 17036**

**United States Trustee**  
  
**228 Walnut Street, Suite 1190**  
  
**Harrisburg, PA 17101**

**Robertson, Anschutz, Schneid & Crane LLC**  
Authorized Agent for Secured Creditor  
10700 Abbott's Bridge Road, Suite 170  
Duluth, GA 30097  
Telephone: (470) 321-7112

By: /s/ Charles G. Wohlrab  
Charles G. Wohlrab, Esquire  
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